

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

MARIO AVILA, on behalf of himself and all §  
others similarly situated employees, §  
§  
Plaintiff, §  
§  
v. § CIVIL ACTION NO. 4:17-cv-03762  
§  
PROJECT RESOURCES GROUP, INC., §  
§  
Defendant. §  
§  
§

**DECLARATION OF MARIO AVILA**

My name is Mario Avila and I declare as follows. I am over the age of 18. The statements in this declaration are true and correct and of my own personal knowledge and I am competent to testify concerning them.

1. I am a former employee of PROJECT RESOURCES GROUP, Inc ("PRG") who investigated outside plant damages for third party clients.
2. As an Investigator, I traveled from location to location in my own vehicle to provide damage investigation services. I worked alone the majority of the time.
3. From my start date through my last date worked, I was not paid overtime despite routinely working more than 40 hours per workweek for PRG and initially was required to submit hours into the system for payroll.
4. I know that other Investigators worked over 40 hours per workweek.

5. During my employment, I was aware that PRG employed other Investigators in Houston and in other cities around the country. They performed the same work as me and were subject to the same job description. I am also aware that PRG did not pay them overtime.
6. I was recently contacted by another Investigator who is interested in opting in to this lawsuit. The Investigator expressed an interest in obtaining overtime pay that Defendant did not pay. It is my understanding that this Investigator will soon submit opt-in paperwork to join this lawsuit.

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED this 07th day of June 2018, in the County of Harris, and the State of Texas.



Mario Avila